

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE WILL COUNTY LOCAL)	
174 CARPENTERS PENSION TRUST FUND)	
and WILL COUNTY LOCAL 174 WELFARE)	
FUND,)	
)	No. 11 C 7481
Plaintiffs,)	
)	Judge Norgle
v.)	
)	
PLAINFIELD CONSTRUCTION COMPANY,)	
an Illinois Corporation,)	
)	
Defendant.)	

MOTION FOR ORDER OF DEFAULT AND JUDGMENT IN SUM CERTAIN

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ, GREGORY W. HOSE and ARNOLD AND KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter an Order of Default as to liability and Judgment in favor of Plaintiffs and against Defendant, PLAINFIELD CONSTRUCTION COMPANY, an Illinois corporation.

In support thereof, Plaintiffs state:

1. This case was filed on October 21, 2011.
2. Defendant was served with Summons and Complaint on November 17, 2011.
3. In excess of 20 days have expired since Service of Process, however, Defendant has failed to file an answer or otherwise plead.
4. Per the affidavit of Richard Wolf, Defendant owes Plaintiffs Trustees of the Will County Local 174 Carpenters, for the audit period January 1, 2006 through December 31, 2011 for \$86,400.70 benefits, \$8,640.07 liquidated damages, \$21,244.51 penalties, \$100.00 discrepancies and \$720.00 audit costs for a total due of \$117,105.28. (Exhibit A)
5. Per the affidavit of Gregory W. Hosé, attorney for Plaintiffs in legal fees and expenses \$2,134.50 has been incurred in this suit. (Exhibit B)

WHEREFORE, Plaintiffs pray for:

1. An Order of Default against the Defendant.
2. Judgment be rendered in the amount of \$119,239.78 for Plaintiffs Trustees of the Will County Local 174 Carpenters, et. al., and against defendant, PLAINFIELD CONSTRUCTION COMPANY.

Respectfully submitted,

**TRUSTEES OF THE WILL COUNTY
LOCAL 174 CARPENTERS, et al.**

By: s/Gregory W. Hosé
One of their Attorneys

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